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ROCKVILLE, MD 20852

SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT PURSUANT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, GN DOCKET NO. 09-51, CC DOCKET NOS. 01-92, 96-45, WT DOCKET NO. 10-208 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION – REDACTED FOR PUBLIC INSPECTION

July 31, 2014

VIA HAND DELIVERY AND ECFS FILING

Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, SW Washington, D.C. 20554

Re: REQUEST FOR CONFIDENTIAL TREATMENT

Plateau Telecommunications, Inc., FCC Form 690 Filing, WT Docket No. 10-208

Dear Ms. Dortch:

Enclosed for filing is an original of the confidential version of the Plateau Telecommunications, Inc. ("Plateau") Federal Communications Commission ("Commission" or "FCC") Form 690 ("Form 690"), including the Form 690's Coverage and Performance Report and Project Status Description attachments. The confidential shapefiles that Plateau submitted to the Universal Service Administrative Company ("USAC") with the Form 690 have also been filed in the Commission's MFI Geospatial Data Collection interface today. Two copies of the redacted, public version of the Form 690 are being filed today under separate cover, as well as electronically via the Commission's ECFS.

Pursuant to 47 C.F.R. §§ 0.457 and 0.459 of the Commission's Rules, Plateau hereby requests that the Commission afford confidential treatment to and withhold from public inspection certain information included in and attachments to Plateau's Form 690, consistent with and pursuant to the confidential treatment provided in the Commission's Third Protective

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Order in the above referenced docket, ¹ and in accordance with the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552. Specifically, Plateau requests that the Commission afford confidential treatment to the following Form 690 information and attachments: Coverage and Performance Report, Project Status Description, and shapefile documents, which provide detailed information about the deployment of Plateau's competitive wireless telecommunications networks and related business plans (the "Confidential Information"). Plateau's Confidential Information meets the requirements for confidential treatment contained in the Commission's rules.²

Each page of the confidential version of the Form 690, Coverage and Performance Report, and Project Status Description is marked "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, GN DOCKET NO. 09-51, CC DOCKET NOS. 01-92, 96-45, WT DOCKET NO. 10-208 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION." Where confidential information is included, the relevant portions of the text are marked "[BEGIN CONFIDENTIAL] [END CONFIDENTIAL]." The shapefile documents have been filed electronically with the Commission's MFI Geospatial Data Collection interface today and have been marked as subject to a request for confidential treatment.

Each page of the redacted version of the Form 690 is marked "SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, GN DOCKET NO. 09-51, CC DOCKET NOS. 01-92, 96-45, WT DOCKET NO. 10-208 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION – REDACTED FOR PUBLIC INSPECTION." Where confidential information has been removed, the relevant portions of the text is marked "[REDACTED]." The entire contents of the attachments to the Form 690, specifically the Coverage and Performance Report, Project Status Description, and shapefile documents, are confidential information and are wholly redacted in the redacted version.

Plateau submits the following information pursuant to Section 0.459 of the Commission's Rules:

(1) Identification of the specific information for which confidential treatment is sought.

Plateau seeks confidential treatment of the Confidential Information, which provides details about Plateau's network deployment and related business plans. This information is

¹ See Connect America Fund et al., Third Protective Order, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, GN Docket No. 09-51, CC Docket Nos. 01-92, 96-45, WT Docket No. 10-208 et al., DA 12-1418 (rel. Aug. 30, 2012) ("Third Protective Order").

² See 47 C.F.R. § 0.459.

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competitively sensitive commercial and financial information and constitutes "confidential commercial information" under Exemption 4 of the FOIA, 47 U.S.C. § 552(b)(4). Accordingly, pursuant to Section 0.459(a) of the Commission's Rules, Plateau requests that such information not be made routinely available for public inspection.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.

The information is being provided to the Commission as part of the required annual report for Mobility Fund Phase I support through the Form 690.

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

As noted above, the information contains competitively sensitive financial and commercial information. Competitors could use this information to gain an unfair competitive advantage.

(4) Explanation of the degree to which the information concerns a service that is subject to competition.

The confidential information being provided to the Commission involves telecommunications services provided by Plateau in competition with other carriers. Plateau is a provider of mobile broadband and voice services in a highly competitive industry. Plateau competes against other providers of broadband and voice services, including mobile services providers, incumbent local exchange carriers, as well as other competitive carriers. The presence of such competition and the likelihood of competitive injury threatened by release of the information provided by Plateau in connection with the Form 690 justify withholding the information from public disclosure.

(5) Explanation of how disclosure of the information could result in substantial competitive harm.

Competitors could use the disclosed information to gain an unfair advantage over Plateau. Specifically, competitors could use this information to learn of Plateau's network deployment and gauge the success of Plateau's marketing efforts and service packages, allowing competitors to adjust their marketing and pricing accordingly, to the detriment of Plateau. Competitors also could gain information regarding the performance of Plateau's mobile broadband and voice networks. Commission precedent has clearly found this type of information to be competitively sensitive and withholdable under the FOIA exceptions. ³

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Specifically, the Commission has recognized that competitive harm can result from the disclosure of confidential business information that gives competitors insight into a company's costs, pricing plans, market strategies, and customers.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure;

Plateau has diligently prevented the unauthorized disclosure of the information, and has kept such information confidential within the company unless otherwise required to be disclosed pursuant to applicable governmental regulations.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

The information has been disclosed to vendors who are subject to non-disclosure obligations and will be filed with the New Mexico Public Regulation Commission pursuant to the Commission's requirements for filing the Form 690. The Confidential Information will be filed confidentially with the New Mexico Public Regulation Commission.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure.

The information regarding Plateau's commercial network deployment information and related business plans must be kept confidential until the public announcement of such information. Confidential treatment must be afforded for this information as long as it would provide a basis for Plateau's competitors to gain insight into Plateau's business operations. At this time, Plateau cannot determine the exact date on which the information could no longer be used by competitors to Plateau's detriment.

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CONCLUSION

For the above reasons, Plateau respectfully requests that the Commission withhold from public disclosure the proprietary commercial and financial information contained in the Confidential Information in the Form 690. In accordance with Section 0.459(g) of the Commission's rules, Plateau requests telephone and written notification from the Commission if the instant request is denied, so that it may file an Application for Review or request return of the confidential materials pursuant to Section 0.459(e).

Respectfully submitted,

Gregory W. Whiteaker

Counsel for Plateau Telecommunications, Inc.

Enclosures

	Fund §54.1009 Annual Reporting ection Form		FCC Form Approved by OMB OMB 3060-1185 Avg. Burden Estimate per Respondent: 18 Hours
Data Con	ection Form	498015	
<010>	Study Area Code	430012	
<015>	Study Area Name	Plateau Telecommunications, Incorporated	
<020>	Program Year	2014	
<030>	Contact Name: Person USAC should contact with questions about this data	Launa Waller	
<035>	Contact Telephone Number: Number of the person identified in data line <030>	5753894211 ext.	
<039>	Contact Email: Email of the person identified in data line <030>	lwaller@plateautel.com	
<040>	Has the information required pursuant to §54.1009 (<041> Attach a description of the documents file		(check box when complete) 4 < 040 >
	<042> Cite the Study Area Code (SAC) for the For	rm 481 reporting	<042>
	<043> Cite the date of the Form 481 reporting		<043>
<050>	Carrier Contact Information (has the contact info. char	nged since prior filing? Yes or No)	ledow
		(If yes, complete the attached worksheet)	<050>
<060>	Coverage and Performance Report	(complete attached worksheet)	<060>
<070>	<u>Urban Rate Comparability Certification</u>	(complete attached certification)	<070>
<080>	<u>Tribal Lands Reporting (y/n?)</u> (Does this study area cover	er tribal lands? Yes or No)	\bigcirc \odot
		(If yes, complete the attached worksheet)	<080>
<090>	Project Update Information	(complete attached worksheet)	<090>
<100>	Certifications		
	<101> Reporting Carrier Certification (comple	ete attached certification)	<101>
	<102> Agent Certification (comple	ete attached certification)	<102>

Notice to Individuals Required by the Paperwork Reduction Act of 1995

OMB Control Number 3060-1185 (Annual Report for Mobility Fund Phase I Support, FCC Form 690 and Record Retention Requirements) Notice to Individuals Required by the Paperwork Reduction Act of 1995

Public reporting burden for this collection of information is estimated to average 18 hours per response. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, Office of Managing Director, AMD-PERM, Washington, DC 20554, Paperwork Reduction Act Project (3060-1185). Please DO NOT SEND COMPLETED FORMS TO THIS ADDRESS. You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number and/or we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-1185.

THIS NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

(050) Carr	ier Contact Form			FCC Form 690
				Approved by OMB
				OMB Control No. 3060-1185
				Page 2 of 8
<010>	Study Area Code		498015	
<015>	Study Area Name		Plateau Telecommunications, Incorporated	
<020>	Program Year		2014	
<030>	Contact Name - Person USAC should contact regarding	this data	Launa Waller	
<035>	Contact Telephone Number - Number of person identi		5753894211 ext.	
<039>	Contact Email Address - Email Address of person identi	fied in data line <030>	lwaller@plateautel.com	
Reporting	Carrier / Mobility Fund Phase 1 Winning Bidder			
<110>	FCC Registration Number	0003800570		
<111>	Filing Carrier Name		cations, Incorporated	
<112>	Winning Bidder Carrier Name	•	cations, Incorporated	
<113>	Street Address (or PO Box)	7111 N Prince St		
<114>	City	Clovis		
<115>	State	NM		
<116>	Zip-Code	88101		
<117>	Telephone Number	5753894211 ext.		
<118>	Fax Number	5753895245		
<119>	Email Address	lwaller@plateautel.	COM	
		Iwalleleplacedatel.		
Contact In	formation			
Contact III	if same as above, indicate in this box			
<120>	Name (First, MI, Last, Suffix)			
<121>	Filing Carrier Name	Launa Waller		
<122>	-	Plateau Telecommunic	cations, Incorporated	
	Street Address (or PO Box)	7111 N Prince St		
<123>	City	Clovis		
<124>	State	NM		
<125>	Zip-Code	88101		
<126>	Telephone Number	5753894211 ext.		
<127>	Fax Number	5753895245		
<128>	Email Address	lwaller@plateautel.c	com	
Authorize	d Agent Information			
	if no agent, indicate in this box			
<120>	Name (First, MI, Last, Suffix)	Robin Tuttle		
<121>	Company	Herman & Whiteaker,	LLC	
<122>	Street Address (or PO Box)	3204 Tower Oaks Blvd	., Suite 180	
<123>	City	Rockville		
<124>	State	MD		
<125>	Zip-Code	20852		
<126>	Telephone Number	2028270667 ext.		_
<127>	Fax Number	2027066056		
<128>	Email Address	rtuttle@hermanwhitea	ker.com	
-120/	Linui Addi Co			

(060) Cov	verage and	Performance	Report								FCC Form Ap proved OMB Cont Page 3 of	d by OM trol No.	B 3060-1185
<010>	Study Ar	ea Code					498015						
<015>	Study Ar	ea Name						1 Telecom	munication	ns, Incor	porated		
<020>	Program						2014						
<030>				contact regarding	_		Launa V						
<035> <039>					erson identified in data line <030> 5753894211 ext. erson identified in data line <030> lwaller@plateautel.com								
<140>	10> Coverage and Performance Report Year 06/2013 - 05/2014												
	498015_CPRd_NM.zip												
		Electro	nic Shapefiles a	attachments									
					No	ame	of Attached Docur	nent (.zip)					
		Drive '	Test Results att	achments									
					Na	те с	of Attached Docum	nent (.zip)					
		Scatto	rad Sita Tast Pa	sults attachmen	te								
		Scatter	eu site Test ne	suits attacimien		ıme o	of Attached Docun	nent (.zip)					
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	State	County	Census Block	Resident Population per Census Block	Resident Population Newly Reach by Service	ned	Total Resident Population Reached by Service	Road Miles per Census Block	Road Miles per Census Block Newly Reached	covered per Census	Certify that Electron ic Shapefil es are uploade d (yes/no)	Result s are upload ed (yes/n	Certify that Scattered Site Tests are uploaded (yes/no)
		1											
		+		9	See atta	сh	ed works	heet				 	
		+			- 55 ana	J. 1	22 1101101						
	-	†											
		1											
		1											
		1											
		Population	nge of Total n Reached by rvice	0			Percentage of Road Miles of By Serv	overed	31		<u></u>		

(070) Urb	oan Rate Comparability Certification Compliance	FCC Form 690	
			Approved by OMB
			OMB Control No. 3060-1185
			Page 4 of 8
<010>	Study Area Code	498015	
<015>	Study Area Name	Plateau Telecommunications, Incorporated	
<020>	Program Year	2014	
<030>	Contact Name - Person USAC should contact regarding this data	Launa Waller	
<035>	Contact Telephone Number - Number of person identified in data line <030>	5753894211 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	lwaller@plateautel.com	

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING CERTIFICATION DATA ON ITS OWN BEHALF:

Cortification of	Officer or Employee as to Compliance with 47 CFR §54.1009(a)(4)
	rrier; my responsibilities include ensuring compliance with 47 CFR §54.1009(a)(4), the information reported on this
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form car	be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING CERTIFICATION DATA ON THE CARRIER'S BEHALF:

Certification of Officer or Employee to authorize an Agent to file (Compliance with 47 CFR §54.1009(a)(4) on Behalf of Reporting Carrier					
I certify that (Name of Agent) Robin Tuttle	is authorized to submit the information reported on behalf of the reporting					
carrier. I also certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring compliance with 47 CFR §54.1009(a)(4) reported to the						
authorized agent; and, to the best of my knowledge, the reports and data provided to	the authorized agent is accurate.					
Name of Authorized Agent: Robin Tuttle						
Name of Reporting Carrier: Plateau Telecommunications, Incom	porated					
Signature of Authorized Officer or Employee: CERTIFIED ONLINE	Date: 07/30/2014					
Printed name of Authorized Officer or Employee: Tom Phelps						
Title or position of Authorized Officer or Employee: CEO						
Telephone number of Authorized Officer or Employee: 5753895100 ext.						
Study Area Code of Reporting Carrier: 498015 Fili	ng Due Date for this form: 07/31/2014					
, ,	ure under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment d States Code, 18 U.S.C. § 1001.					

TO BE COMPLETED BY THE AUTHORIZED AGENT:

		•	ng carrier; I have provided the data reported herein based o
data provided by the reporting carrier; and, to the best of n	Plateau Telecommunications, In		ate.
Name of Authorized Agent or Employee of Agent:	Robin Tuttle	corporatea	
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE		Date: 07/30/2014
Printed name of Authorized Agent or Employee of Agent:	Robin Tuttle		
Fitle or position of Authorized Agent or Employee of Agent	Authorized Agent		
Telephone number of Authorized Agent or Employee of Age	nt: 2028270667 ext.		
Study Area Code of Reporting Carrier: 498015	Filing Due Dat	te for this form:	07/31/2014

(080) Triba	al Lands Reporting			FCC Form 690 Approved by OMB OMB Control No. 3060-1185
				Page 5 of 8
<010>	Study Area Code		498015	
<015>	Study Area Code Study Area Name		Plateau Telecommunication	s, Incorporated
<020>	Program Year		2014	
<030>	Contact Name - Person USAC should contact regarding		Launa Waller	
<035>	Contact Telephone Number - Number of person identifi			
<039>	Contact Email Address - Email Address of person identif	ied in data line	<pre><030> lwaller@plateautel.com</pre>	
<142>	State			
<143>	County			
<144>	Tribal Land(s) on which ETC Serves			
<145>	Tribal Government Engagement Obligation		10	
		Name of Attach	ed Document (.pdf)	
	If your company serves Tribal lands, please select (Yes,N	lo. NA) for		
	each of these boxes to confirm the status described on			
	PDF, on line 145, demonstrates coordination with the T	ribal		
	government pursuant to § 54.1004 includes:			
			Select	
<146>	Needs assessment and deployment planning with a foo	cus on Tribal	(Yes,No, NA)	
	community anchor institutions;			
<147>	Feasibility and sustainability planning;			
<148>	Marketing services in a culturally sensitive manner;			
<149>	Compliance with Rights of way processes			
<150>	Compliance with Land Use permitting requirements			
<151>	Compliance with Facilities Siting rules			
<152>	Compliance with Environmental Review processes			
<153>	Compliance with Cultural Preservation review processes	S		
<154>	Compliance with Tribal Business and Licensing requirem	ants		

(090) Project	Update Information	FCC Form 690
		Approved by OMB
		OMB Control No. 3060-1185
		Page 6 of 8
<010>	Study Area Code	100015
<015>	Study Area Name	498015 Plateau Telecommunications, Incorporated
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Launa Waller
<035>	Contact Telephone Number - Number of person identified in data line <030>	5753894211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lwaller@plateautel.com
<200>	Date Authorized to Receive Support	06/20/2013
<201>	Targeted Completion Date	06/19/2016
<202>	Total Mobility Fund Support Awarded	829987.35
<203>	Total Mobility Fund Support Disbursed	276662.45
<204>	Support Applied to Network Design	
<205>	Support Applied to Construction	
<206>	Support Applied to Deployment	
<207>	Support Applied to Maintenance	
<208>	Certify Network will Support 3G Mobile Service (Yes / No)	\bigcirc \bigcirc
<209>	Certify Network will Support 4G Mobile Service (Yes / No)	• •
<210>	Actual Completion Date	
<211>	Project Status Description (attached)	498015_PSD_NM.pdf
<212> <213> <214> <215> <216> <217>	Please check these boxes below to confirm that the attached PDF, on line 211, contains a project status pursuant to §54.1005(b)(2)(v). The information shall be submitted as appropriate. Status of Network Deployment - Network Design Status of Network Deployment - Construction Status of Network Deployment - Deployment Status of Network Deployment - Maintenance Project Budget Status Project Plan Status	{Name of PDF attached}

(101) Cer	tification - Reporting Carrier		FCC Form 690
			Approved by OMB
			OMB Control No. 3060-1185
			Page 7 of 8
<010>	Study Area Code	498015	
<015>	Study Area Name	Plateau Telecommunications, Incorporated	
<020>	Program Year	2014	
<030>	Contact Name - Person USAC should contact regarding this data	Launa Waller	
<035>	Contact Telephone Number - Number of person identified in data line <030>	5753894211 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	lwaller@plateautel.com	

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the A	ccuracy of the Data Reported for the Annual Reporting for Mobility Fund Recipients
I certify that I am an officer of the reporting carrier; my res best of my knowledge, the information reported on this for	onsibilities include ensuring the accuracy of the annual reporting requirements for Mobility Fund recipients; and, to the mand in any attachments is accurate.
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form ca	be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

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(102) Cer	tification - Agent / Carrier		FCC Form 690 Approved by OMB OMB Control No. 3060-1185 Page 8 of 8
<010>	Study Area Code	498015	
<015>	Study Area Name	Plateau Telecommunications, Incorporated	
<020>	Program Year	2014	_
<030>	Contact Name - Person USAC should contact regarding this data	Launa Waller	
<02E>	Contact Tolophone Number - Number of person identified in data line <0.20	ERE3004011	<u> </u>

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

<039> Contact Email Address - Email Address of person identified in data line <030> lwaller@plateautel.com

I certify that (Name of Agent) Robin Tuttle is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: Robin Tuttle	
Name of Reporting Carrier: Plateau Telecommunications, Incorporated	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 07/30/2014
Printed name of Authorized Officer: Tom Phelps	
Title or position of Authorized Officer: CEO	
Telephone number of Authorized Officer: 5753895100 ext.	
Study Area Code of Reporting Carrier: 498015 Filing D	ue Date for this form: 07/31/2014
, ,	ure under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment d States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

ipients on behalf of the reporting carrier; I have provided the data on reported herein is accurate.
ii reporteu nereni is accurate.
Date: 07/30/2014
07/31/2014

[REDACTED]

Attachments